

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORKTammy L. Green

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

**COMPLAINT  
FOR EMPLOYMENT  
DISCRIMINATION**New York City Transit Authority  
Roosevelt J. LernerJury Trial: ☒ Yes ☐ No  
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. Typically, the company or organization named in your charge to the Equal Employment Opportunity Commission should be named as a defendant. Addresses should not be included here.)

15CV8204

This action is brought for discrimination in employment pursuant to: (check only those that apply)

\_\_\_\_\_ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

*NOTE: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.*

\_\_\_\_\_ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 - 634.

*NOTE: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.*

\_\_\_\_\_ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 - 12117.

*NOTE: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.*

☒ New York State Human Rights Law, N.Y. Exec. Law §§ 290 to 297 (age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status).

☒ New York City Human Rights Law, N.Y. City Admin. Code §§ 8-101 to 131 (actual or perceived age, race, creed, color, national origin, gender, disability, marital status, partnership status, sexual orientation, alienage, citizenship status).

**I. Parties in this complaint:**

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name Tammy L. Green  
 Street Address 110 West 111<sup>th</sup> St. Apt 32  
 County, City Manhattan, N.Y. 10026-4224  
 State & Zip Code \_\_\_\_\_  
 Telephone Number (917) 736-2671

- B. List all defendants' names and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant Name Roosevelt J. Lannier  
 Street Address % New York City Transit Authority  
 County, City 130 Livingston Street  
 State & Zip Code Brooklyn, N.Y. 11201  
 Telephone Number (845) 689-1047

- C. The address at which I sought employment or was employed by the defendant(s) is:

Employer New York City Transit Authority  
 Street Address 130 Livingston Street  
 County, City Brooklyn, N.Y. 11201  
 State & Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_

**II. Statement of Claim:**

State as briefly as possible the facts of your case, including relevant dates and events. Describe how you were discriminated against. If you are pursuing claims under other federal or state statutes, you should include facts to support those claims. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

- A. The discriminatory conduct of which I complain in this action includes: *(check only those that apply)*

☐ Failure to hire me.  
☐ Termination of my employment.  
☐ Failure to promote me.  
☐ Failure to accommodate my disability.  
☒ Unequal terms and conditions of my employment.



Retaliation.

Other acts (specify): \_\_\_\_\_

**Note:** Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.

B. It is my best recollection that the alleged discriminatory acts occurred on: Dec 2013  
Date(s)

C. I believe that defendant(s) (check one):

☒ is still committing these acts against me.

☐ is not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (check only those that apply and explain):

☐ race \_\_\_\_\_

☐ color \_\_\_\_\_

☒ gender/sex female

☐ religion \_\_\_\_\_

☐ national origin \_\_\_\_\_

☐ age. My date of birth is \_\_\_\_\_ (Give your date of birth only if you are asserting a claim of age discrimination.)

☐ disability or perceived disability, \_\_\_\_\_ (specify)

E. The facts of my case are as follow (attach additional sheets as necessary):

I started a new pick at East 180<sup>th</sup> Street for NYCTA. I had an affair with Maintenance Supervisor I Roosevelt I. Lannier. Things were ok for a while but when he couldn't get what he wanted sexually things started to take a turn for the worst. I started getting unwanted pornographic text messages on various dates. I received multiple propositions for sex, but he was told to get his physical needs met at home from

**Note:** As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, the New York State Division of Human Rights or the New York City Commission on Human Rights.

### III. Exhaustion of Federal Administrative Remedies:

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding defendant's alleged discriminatory conduct on: July 21, 2015 (Date).



B. The Equal Employment Opportunity Commission (*check one*):

✓ has not issued a Notice of Right to Sue letter.  
✓ issued a Notice of Right to Sue letter, which I received on Sept 2015 (Date).  
*Misplaced Original will get copy & submit to court at later date*

*Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.*

C. Only litigants alleging age discrimination must answer this Question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct (*check one*):

         60 days or more have elapsed.  
         less than 60 days have elapsed.

IV. Relief:

WHEREFORE, plaintiff prays that the Court grant such relief as may be appropriate, including injunctive orders, damages, and costs, as follows: \_\_\_\_\_

\_\_\_\_\_  
(Describe relief sought, including amount of damages, if any, and the basis for such relief.)

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 16 day of Oct, 2015.

Signature of Plaintiff

Address

W. Green  
110 West 11<sup>th</sup> St Apt 32  
Manhattan, N.Y. 10026-4224

Telephone Number

Fax Number (*if you have one*)

(917) 736-2671

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his wife. He started being physical at the workplace  
(ex putting his hands in my face  
constant threats of physical intimidation  
buckling the back of my knee caps  
trapping me on purpose

Things also progressed from M/S I Lannier being aggressive towards me but also other co-workers too. I was about to sign out for the day ~~and~~ when both marlman approached me about going to a sex club. I thought it was strange because we were not on the topic what so ever on anything like that. I believe it was a tactic to instill fear, intimidation or to make me feel shame. Bottomline I didn't like it. On July 12, 2015 I was working with the clippers (Armstrong & Cabrera). That day Armstrong & me had a big blow out because he said that I was going to slow & that I was taking there time out for relaxing. He said that I heard you was bi-polar & that's why no one wanted to work with me. Needless to say things got pretty heated & he treated to prevent me from working, but I did my job anyway. When I was working at East 180th Street with the clippers (Armstrong & Cabrera) Armstrong was in the bucket clippings & Cabrera & I was down stairs watching the hoses & the generators. I noticed Cabrera looking at something & I turned around to see trackworker Levy with an AX that he got from the location where we were at. It should also be noted that the AX Levy obtained is not an MTA NYCTA tool. Levy was swinging the AX in a repeated back & forth motion at the back of my head & when I turned around towards the front of my head at least 10 or more times. It reminded me of the You-Tube beheading Al Kayda videos or at the batting cages for practice. What should also be important to note that even though the crane was in the same general location Levy's position of

the work was already finished so there was no real reason why he should be back there with us. (3)

Also just recently on Oct 4, 2015<sup>@ 8pm</sup> another truckworker Payton touched me inappropriately<sup>on purpose</sup> while I was simultaneously signing in for my assignment that night. I told him if I knocked him upside his fat head he would swear I was wrong. Then he apologized but the damage was already done. Basically, I think M/S I Larrier & my other co-workers do not want me to be there to do what I do. I believe because I am a female, who is African-American strong willed & very opinionated. I feel as if they are trying everything in their power to force me out of my current position. They are trying to push my buttons & get me to the point where I want to lay some physical & direct heavy hands on them, so that I will get fired & lose my job, livelihood & financial stability. I feel as if I have done everything possible to work through this situation but I'm tired & I can't take it anymore.